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**October 1, 2021**

*Via ECF*

Honorable Analisa Torres  
United States District Judge  
United States Courthouse  
Courtroom 15D  
500 Pearl Street New York, NY 10007

Re: **JOINT REQUEST FOR MEDIATION**

*Jessore Management SA v. Brit Syndicate 2987 and Other Lloyd's Underwriters*  
Docket No.: 20-cv-5849 (AT) (KNF)  
HBN Ref. No.: 608.0001

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Dear Judge Torres:

We represent plaintiff, Jessore Management SA and with Clyde & Co US LLP, counsel for defendant underwriters, Brit Syndicate 2987, et al., we respectfully make this joint request to stay the referenced action to allow the parties to pursue mediation, to be organized and conducted expeditiously, as soon as a mutually acceptable mediator can be agreed upon, subject to the Court's approval of the instant request for a stay.

While mediation is not guaranteed to result in settlement, we can say that the willingness of the parties to enter a dialogue marks significant progress. The December 19, 2020 Case Management Plan Scheduling Order (Doc. 22, ¶ 10.b) refers to mediation at the appropriate time, before a private mediator. The parties are now familiar with the issues and their respective positions, and counsel believe now is the appropriate time to engage in this process. We have started inquiries for selecting a mediator and agreeing to protocols and scheduling, which should promptly be worked out in the next weeks.

If such is acceptable to the Court, we respectfully request that all pending matters be stayed without prejudice pending the outcome of the mediation. Further, the parties undertake to report progress to the Court before the end of October.

GRANTED. This matter is STAYED pending the completion of mediation proceedings. By **November 15, 2021**, the parties shall submit a status letter apprising the Court on the status of mediation.

SO ORDERED.

Dated: October 4, 2021  
New York, New York

A handwritten signature in black ink, appearing to be 'Analisa Torres', is written over a horizontal line.

ANALISA TORRES  
United States District Judge